

EXHIBIT H

(Exhibits to the letter not included due to volume. They will be provided separately *via* jump drive)

Robbie Lea Ward
Lawyer
530 Lexington Avenue
San Antonio, Texas 78215
(210) 758-2200 (office)
(210) 758-8500 (cell)
RobbieWardLaw.com
Robbie@RobbieWardLaw.com

AUSA Russ Leachman
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

RE: Humberto Moreira

Dear Russ:

We spoke a few weeks ago about Humberto Moreira Valdés. I informed you that he wanted to proffer some information to the government, not knowing if he has been indicted or not. When we spoke, I had not met Mr. Moreira in person or his attorneys in Mexico. I did not want to proffer anything before having the opportunity to meet him in person and speak to his attorneys. I have since met with all of them and believe that Mr. Moreira is not responsible for any wrongdoings.

Here is a summary of what I learned through Mr. Moreira and his attorneys:

Humberto Moreira Valdés learned through a judicial instruction, that was initiated in Madrid, Spain, that the United States Attorney's office was conducting an investigation in which the witness named Héctor Javier Villarreal Hernández made statements against Humberto Moreira Valdés.

It appears that since at least 2014 to present day, Mr. Villarreal, has been in the United States, living in San Antonio, on bond for federal indictments in San Antonio and Corpus Christi. Mr. Villarreal must be a cooperating witness for the government, because he is on bond and not a US citizen. During these years he has had indictments pending against him in Mexico for additional crimes including money laundering. The details of the investigation against Mr. Villarreal, for the crimes of money laundering or operations with recourse of illegal origin (as it is called in Mexico), can be reviewed in the complaint that is identified with the EDF judicial file number / SLP / SLP / 000169/2019, which is added to this document as Exhibit 3.

Any attempt to place blame on Mr. Moreira for the crimes facilitated by and committed by Villareal and others has, thus far, proven to be false, based on everything I have seen. Mr. Moreira has no bank accounts with large sums of money or property in the United States, and does not own any radio stations. Mr. Villarreal is wanted in Mexico for multiple indictments and has continued to launder money while in the United States.

**Most Recent Complaint against
HÉCTOR JAVIER VILLAREAL HERNÁNDEZ
in Mexico.**

Re: Money Laundering investigation in San Luis Potosi, Mexico.

Since February 2019, Mexican investigators in San Luis Potosi, Mexico, have been conducting a money laundering investigation into Mr. Villarreal. Prosecutors assigned to the case suspect Mr. Villarreal of drawing funds from a Mexican bank account in another's name (José Martino Hernández) to supplement his lifestyle in San Antonio, Texas. The funds were drawn between October 2017 to November 2018.

It was learned that Mr. José Martino Hernández formally filed a complaint against Mr. Villarreal with the Attorney General's Office in San Luis Potosi, Mexico, on February 11, 2019, which is identified with the judicial file FED / SLP / SLP / 000169 / 2019. Because Mr. Hernandez had worked for Villareal's father in the past at a company named Impulsora de Multiservicios Industriales SA de CV, it is believed that Mr. Villarreal, with the assistance of his father, opened an account in his name and without his consent by the instruction of Mr. Villarreal and his father HÉCTOR JAVIER VILLAREAL GARCÍA at Banca Afirme SA, account number V00081506140, with payroll card number 5349-4301-1213-6038.

Sometime later, Mr. José Martino Hernández learned that the payroll card number 5349-4301-1213-6038 from Banca Afirme was sent to Mr. Villarreal in the United States of America to cover his expenses in that country, by instruction of Mr. Villarreal.

In this investigation, the Prosecutor's Office has obtained, as evidence, the testimony of witness Leticia Galván Valdez, who stated (in Spanish):

"I know the company" IMPULSORA DE MULTISERVICIOS INDUSTRIALES, S.A. DE CV, I know her because that company attended about 1 (one) year, C. HÉCTOR JAVIER VILLAREAL HERNÁNDEZ, told me that he will introduce me to perform administrative functions, his father named HÉCTOR JAVIER VILLAREAL GARCÍA, was the one who gave the instructions, for the functions he performed at the end of 2017, by instructions given by HÉCTOR JAVIER VILLAREAL HERNÁNDEZ, from the United States of América, the company "IMPULSORA DE MULTISERVICIOS INDUSTRIALES, S.A. OF C.V. He processed a payroll card at Afirme Bank, in the name of JOSÉ MARTINO HERNÁNDEZ, I had nothing to do with the processing of said card, so I don't know how it was obtained, much less in which Coahuila branch was processed, just I had knowledge that was obtained; I also learned that C. HÉCTOR JAVIER VILLAREAL HERNÁNDEZ requested that the card in the name of JOSÉ MARTINO HERNÁNDEZ be taken to

the United States of America and who took it was a person named MARTÍN HERNÁNDEZ, that card was deposited approximately \$ 300,000.00 (three hundred thousand pesos 00/100 MN) per month, which C. HÉCTOR JAVIER VILLAREAL HERNÁNDEZ used for his expenses in the United States of America, I also know that he was taking cash to C. HÉCTOR JAVIER VILLAREAL HERNÁNDEZ to the United States from America, his brother EDUARDO VILLAREAL HERNÁNDEZ and another person named SUSANA GONZÁLEZ GONZÁLEZ, of the latter knowledge because C. HÉCTOR JAVIER VILLAREAL GARCÍA took cash to the office, sometimes dollars and other national currency and asked me to deliver them to those people. Who gave the instructions to make the transfers and take the money physically to HÉCTOR JAVIER VILLAREAL HERNÁNDEZ to the United States of America, was his father named HÉCTOR JAVIER VILLAREAL GARCÍA, who was in charge of the company "IMPULSORA DE MULTISERVICIOS INDUSTRIALES S.A. OF C.V." I would like to point out that C. HECTOR JAVIER VILLAREAL GARCÍA, whenever he went to the company "IMPULSORA DE MULTISERVICIOS INDUSTRIALES S.A. DE CV" I was accompanied by people with very bad looks, I also handled a lot of cash, so I tried to resign repeatedly because all that scared me, but they never accepted my resignation and I always felt threatened by it. I did nothing since I was afraid of how they handled themselves. At the end of last year, C. HÉCTOR JAVIER VILLAREAL GARCÍA stopped attending the company and was said to have been arrested with weapons in Tamaulipas and after that I learned from the news that it was true. Earlier this year, while still working at the company "IMPULSORA DE MULTISERVICIOS INDUSTRIALES S.A. DE CV", JOSÉ MARTINO HERNÁNDEZ, told me that a payroll card had already been processed in his name at Afirme bank and I told him that it had been on the instructions of HECTOR JAVIER VILLAREAL HERNÁNDEZ, who was based in the United States of America and that the deposits made on that card were also instructed by HECTOR JAVIER VILLAREAL HERNANDEZ and his father HECTOR JAVIER VILLAREAL GARCÍA, he told me that he had never given authorization to process that card and much so that HECTOR JAVIER VILLAREAL HERNÁNDEZ would use it to his Name in the United States of America. ... "

Investigators and prosecutors have data that IMPULSORA DE MULTISERVICIOS INDUSTRIALES, S.A. from C.V. (IMI S.A. de C.V.), is being used as an instrument to channel funds to Mr. Villarreal Hernández, and it is suspected with a high degree of probability that IMI S.A. de C.V., is owned and operated by his father HECTOR JAVIER VILLAREAL GARCÍA.



For this reason, investigators and prosecutors believe that the deposits made in the account of another person (José Martino Hernández), that Mr. Villarreal uses to complement his lifestyle and to try to invest in new businesses in San Antonio, Texas, may derive from the criminal activities committed by Mr. Villarreal when he defrauded the State of Coahuila of millions of dollars.

Additionally, the statements from account number V00081506140, with debit card 5359-4301-1213-6038 (from the period of October 1, 2017 to December 31, 2018) had cash deposits and transfers made in large amounts, as well as expenses and cash provisions. All transactions were made in the United States of America. Most of the expenses have been made in San Antonio, TX, Carthage, TX, Houston, TX, and Austin, TX, and were used to pay for restaurants, clothing stores, children's toys, etc. Mr. Villarreal also used the debit card at Mercedes Benz of San Antonio, TX, Verizon of San Antonio, TX, Apple Store of San Antonio and a medical clinic.

The most relevant expenditures made by Mr. Villarreal (with the card in the name of José Martino Hernández) were for the purchase of restaurant equipment and the payment of commercial advertisement services. These are relevant because buying restaurant equipment and commercial advertising services to open and operate a new business in the United States of America, and hiding the origin of the money from that investment through the card in the name of Mr. José Martino Hernández, is evidence that Mr. Villarreal is guilty of Money Laundering or Operations with Resources of Illicit Origin, as that illegal conduct in Mexico is called.

The Prosecutor's Office also collected the report of the National Institute of Migration of Mexico which reports that Mr. José Martino Hernández, during the years 2016, 2017, and 2018, has no record of entries or exits from the country. This means that he could not have been the one using the card in the United States during this time frame, as he has asserted to the Mexican authorities.

The account holder, Jose Martino Hernandez, I believe is the same Martino that investigators wanted to depose after the civil forfeiture of over six million dollars from Hector Villarreal and his wife, Teresita Botello, by the Bexar County District Attorney's Office in 2012.

P00067	2/24/2014	INTENTION TO TAKE DEPOSITION OF C/R TROY LONNIE MEINKE ESQ MS ALTAGARCIA DANIELA RODRIGUEZ GARCIA MR HECTOR JAVIER VILLARREAL HERNANDEZ AERO PREMIO LLC BARCELONA AT STONE OAK VILLA PREMIO LLC UNKNOWN ACCOUNT HOLDER SPRING SENT LLC
P00066	2/24/2014	LETTER TO DISTRICT CLERK FR: APEX DOCUMENT MANGEMENT INC RE: FILING
P00065	2/18/2014	CERTIFICATE OF DEPOSITION OF FRANCISCO XAVIER FLORES VALDEZ
P00064	2/18/2014	CERTIFICATE OF DEPOSITION OF MANUEL TERRAZAS
P00063	2/18/2014	CERTIFICATE OF DEPOSITION OF JORGE ALBERTO RAMIREZ OCHOA
P00062	2/18/2014	CERTIFICATE OF DEPOSITION OF MARCO ANTONIO MARTINEZ
P00061	2/18/2014	CERTIFICATE OF DEPOSITION OF JOSE MARTINO HERNANDEZ 
P00060	1/7/2014	CERTIFICATE OF DEPOSITION OF JOSE MARTINO HERNANDEZ 

Source: https://search.bexar.org/Case/CaseDetail?r=be2f32a2-37f3-4cba-bf5c-afabb36b3dbb&st=l&l=Botello&fn=Maria&m=T&=&full=y&p=2_2012CI03791%20%20%20%20DC0000600000

The image below is an excerpt from a bank statement dated February 2018, of the account being utilized by Mr. Villarreal and investigated by Mexican authorities in SLP Mexico. see "Exhibit 3".

12	ACE MART REST SUPPLY	7,719.65	690,776.72
12	ACE MART REST SUPPLY	490.50	691,267.22
12	RGR GRAPHICS	3,678.76	694,945.98
12	ACE MART REST SUPPLY	4,199.66	699,145.64
12	CHICK-FIL-A #01265	89.85	699,055.79
12	CHICK-FIL-A #01265	814.32	698,241.47
12	ACE MART REST SUPPLY	7,734.21	690,507.26
12	ACE MART REST SUPPLY	491.43	690,015.83
12	RGR GRAPHICS	3,685.71	686,330.12
12	ACE MART REST SUPPLY	4,207.59	682,122.53

The debit card transactions listed above demonstrate where Mr. Villarreal used the debit card, specifically Ace Mart Rest Supply and RGR Graphics, both located in San Antonio, TX. The screen pic below was found in the RGR Graphics website. It appears RGR Graphics did advertisement work for "L Taco Mexican Café" located at 7531 Bandera Rd. #101, San Antonio, TX.



Source: <https://www.rgrgraphicstexas.com/services.html>

I believe the expenses cited above, were made to financially support the "L Taco Mexican Café" franchise which is, or was once, owned by Enrique L. Resendez III, also known as Enrique Leobardo Resendez Covarrubias, a former Mexican PRI party political member. See picture on next page dated April 17, 2011.

NOTICIAS DE NUEVO LAREDO

Enrique L. Resendez III
aka
Enrique Leobardo Resendez Covarrubias

Enrique Resendez Sr.

domingo, 17 de abril de 2011

ENRIQUE RESENDEZ COVARRUBIAS NUEVO PRESIDENTE DEL PRI EN NUEVO LAREDO



Datos personales

Unknown

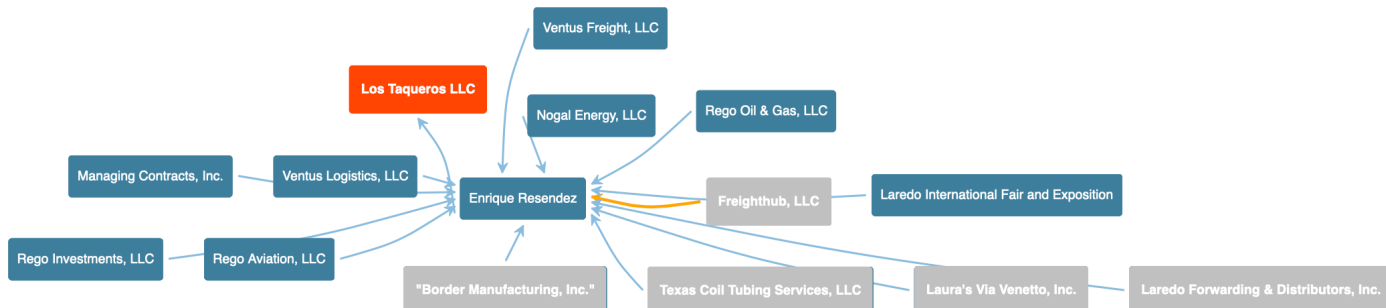
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Source: <http://noticiasdenuevolaredo.blogspot.com/2011/04/enrique-resendez-covarrubias-nuevo.html>

It appears “L Taco Mexican Café” operates under Los Taqueros LLC. See all companies owned by Enrique L. Resendez.



Source: <https://www.corporationwiki.com/p/2jy0ey/los-taqueros-llc>

It also appears that one of the “L Taco Mexican Café” locations had delinquent tax issues. See pictures below.

Case #2017TA101779 History 00006

Name

Date Filed

8/17/2017

Case Status

DISPOSED

Litigant Type

DEFENDANT

Court

037

Docket Type

DELINQUENT TAXES

Business Name

L TACO MEXICAN CAFE

Style

BEXAR COUNTY ET AL

Style (2)

vs LOS TAQUEROS LLC

Source: <https://www.bexar.org>

Open source information discovered that PRI party member, Enrique L. Resendez III aka Enrique Leobardo Resendez Covarrubias and Enrique Resendez Sr. pictured above in April 2011, are the same individuals photographed in the “L Taco Mexican Café” Grand Opening and Ribbon Cutting event at 19202 Stone Oak Pkwy #103 on Oct 8th, 2015.





L Taco Ribbon Cutting

L-Taco Mexican Cafe held their Grand Opening and Ribbon Cutting event at 19202 Stone Oak Pkwy #103 on Oct 8th, 2015, with the Stone Oak Business Association, special guests, associate ambassadors and many more.

L-Taco is proud to bring their first location for San Antonio community. L-Taco is bringing 100% authentic Mexican food to those who love the genuine taste of Mexico.

President of the Chain Mr. Enrique Resendez spoke during the ribbon cutting and before offering the samples of food and drinks they offer.

For more information about this new Location, call (210)49L-TACO, or (210)495-8226.

You can also follow all L-Taco social media:

facebook.com/eat.l.taco

[twitter.com/eat l taco](https://twitter.com/eat_l_taco)

instagram.com/eat.l.taco

L-Taco was founded by a group of friends with Mexican backgrounds. They always dreamed of creating a true genuine Mexican food restaurant where they could offer the tastes they grew up with. A restaurant that features Mexico's best recipes, tortillas and salsas. At the time of their Grand Opening, They have a couple of additional locations planned that will soon.

By SOBA|November 18th, 2015

Later, on December 13, 2017, the franchise opened another “L Taco Mexican Café” located at 7531 Bandera Rd. #101, San Antonio, TX.

📅 December 13, 2017



Enrique L. Resendez III
aka
Enrique Leobardo Resendez Covarrubias

From left to right: Hilary Ryan-Lucas (Landry's), Jessica Sepulveda (Wyndham Garden near La Cantera), Rhonda Boyles (RJ Boyles Law, PLLC), Michael Conway (L – Taco Mexican Café), Doyle Brown (LegalShield), Enrique L. Resendez III (L – Taco Mexican Café), Laura Palma (The Bank of SA)

Source: <https://www.sachamber.org/news/2017/12/13/ribbon-cutting-november-29-2017-l-taco-mexican-cafe-bandera-rd/>

The debit card transaction dates listed above coincide with this particular grand opening. In addition, the RGR Graphics website photo matched the building where they did advertisement for the restaurant. That particular restaurant subsequently closed and reopened as “Las Quesadillas”.

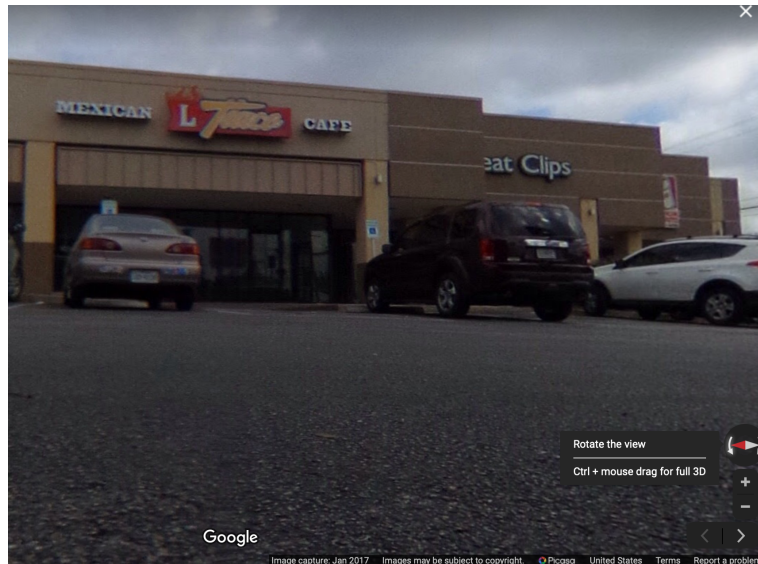


Source:

<https://www.google.com/maps/place/12311+Nacogdoches+Rd+%23104,+San+Antonio,+TX+78217/@29.5530443,-98.407633,17z/data=!3m1!4b1!4m5!3m4!1s0x865c8b65b8eefad1:0xe66ad8f93c05dab2!8m2!3d29.5530443!4d-98.4054443>

Source: <https://www.rgrgraphicstexas.com/services.html>

On December 6, 2017, another “L Taco Mexican Café” had a grand opening at 12311 Nacogdoches Rd., San Antonio, TX. That location also subsequently closed.



Source:

<https://www.google.com/maps/place/12311+Nacogdoches+Rd+%23104,+San+Antonio,+TX+78217/@29.5530443,-98.407633,17z/data=!3m1!4b1!4m5!3m4!1s0x865c8b65b8eefad1:0xe66ad8f93c05dab2!8m2!3d29.5530443!4d-98.4054443>

Sources of information suggest there was a civil dispute between Enrique L. Resendez III and Mr. Villarreal. Delinquent taxes may have been the source of that dispute.

Mr. Villarreal is currently subject to several criminal charges in Mexico, which is why the Mexican government considers him a fugitive from justice.

Below are the active arrest warrants that Mr. Villarreal has against him:

1. On October 28, 2011, Mr. Villarreal was captured by arrest warrant of the Second Criminal Court of Saltillo, Coahuila, for the crime of Equated Fraud for simulating legal acts and the use of false documents.
2. The Judge granted bail to Mr. Villarreal, which was forfeited when he fled the country and a restraining order was issued against him on February 3, 2012, which he has not complied with to this day; therefore, Mr. Villarreal is considered a fugitive from State Justice in this case.
3. Mr. Villarreal also has another warrant for the arrest (apprehension) of the Sixteenth District Court of Federal Criminal Proceedings in Mexico City, for the crime of breach of public finances of the State of Coahuila and since he has not been in compliance with said arrest warrant, Mr. Villarreal is considered a fugitive from the Federal Justice System.

The Attorney General's Office, in order to capture Héctor Javier Villarreal Hernández, began an international extradition process against him.

The information on the capture and re-capture orders against Mr. Villarreal is public and can be viewed at:

<https://www.proceso.com.mx/567088/extesorero-de-coahuila-sera-reaprehendido-al-finalizar-su-juicio-en-eu-afirma-fiscalia>

<https://vanguardia.com.mx/articulo/detienen-en-tamaulipas-al-padre-de-javier-villarreal-ex-tesorero-de-coahuila-llevaba-5>

<http://ntrzacatecas.com/2011/10/29/cae-por-moreirazo/>

https://www.zocalo.com.mx/new_site/articulo/orden-de-reaprehension-contr-javier-villarreal-sigue-vigente-fiscal

https://www.zocalo.com.mx/new_site/articulo/ordenan-recaputra-de-javier-villarreal

<https://mvsnoticias.com/noticias/policiaca/se-le-escapan-a-la-pgr-cinco-ex-funcionarios-implicados-en-el-moreirazo-458/>

The Attorney General of the State of Coahuila, publicly informed that there are four active complaints against Mr. Villarreal Hernández:

1. Order of re-capture of the Second Judge of First Criminal Instance of Saltillo, Coahuila, for the crime of Equated Fraud for simulating legal acts and using false documents.
2. Criminal case for the use of false documents for the contracting of credits, before the Banco del Bajío institution, an investigation in which an order of appearance exists, for which support from INTERPOL was requested.
3. Investigation of the crimes of illicit enrichment, peculation and several others against Mr. Villarreal Hernández.
4. Open investigation for the improper use of influences, concussion, and improper exercise of public functions.

This information can be consulted at:

<https://vanguardia.com.mx/articulo/enfrenta-villarreal-4-denuncias-una-con-orden-de-reaprehension>

Spain: This information was provided by Mr. Moreira's attorney's in Mexico (Exhibit 1 & Exhibit 2)

The judicial investigation that began in Madrid Spain against Humberto Moreira Valdés, was being carried out in the Central Court of Instruction No. 1, Prior Measures 25 / 2014-2.

By official letter dated January 22, 2016, the Spanish court ordered the release of Humberto Moreira Valdés and on February 9, 2016, he determined the provisional dismissal of the proceedings.

By letter of November 13, 2018, it was ordered to reopen the judicial instruction regarding Humberto Moreira Valdés.

The Spanish Prosecutor's Office requested the reopening of the judicial instruction of Humberto Moreira Valdés, because of statements made in San Antonio, Texas, by Rolando González-Treviño and HÉCTOR JAVIER VILLARREAL HERNÁNDEZ, statements that are presented as Exhibit 1 of this document.

The testimony of the witness HÉCTOR JAVIER VILLARREAL HERNÁNDEZ, was carried out on December 13, 2017 in San Antonio Texas, through the videoconference system to be taken into account by the Spanish authorities, Mr. Villarreal, assisted by his lawyer Mr. Michael Wynne, of Houston, Texas (state bar number 00785289), and in the presence of AUSA Russell Leachman, Mr. Villarreal made several accusations against Humberto Moreira Valdés.

In the judicial instruction, the Spanish authorities were shown, through real information and evidence, that the statements made by Mr. Villarreal against Humberto Moreira Valdés are false.

In order to verify and confirm the information and evidence with which the Spanish judicial authorities were accredited, the falsity of the statements made by Mr. Villarreal against Humberto Moreira Valdés, is presented in Exhibit 2 of this document, written by Dr. VIRGINIA ARAGÓN SEGURA, defender of Humberto Moreira Valdés, addressed to the Court of Instruction Center No. 1, of Madrid, Spain. In it she relates and details each accusation made by Mr. Villarreal against Humberto Moreira Valdés, along with evidence proving his allegations are false.

Dr. VIRGINIA ARAGÓN SEGURA'S defense of Humberto Moreira Valdés in Madrid, Spain, provided actual evidence proving Mr. Villarreal was not telling the truth or being honest during his statement on December 13, 2017. In that statement he attempted to justify the unlawful conduct he had carried out against the Public Finances of the State of Coahuila and for which he has an arrest warrant and extradition request (and evidently as a strategy to free himself from those charges in the United States). He fled Mexican justice and has yet to face the various criminal cases that are pending in both federal and state courts in Mexico.

Mr. Villarreal, in his statement of December 13, 2017, sought to justify his own criminal acts and decisions by saying that he, as Secretary of Finance, and all the secretaries of the

Government of the State of Coahuila, Mexico, depended on the Governor for all decisions. But he purposefully omitted the fact that the Organic Law of the Public Administration of Coahuila, effective from December 7, 2005 to November 30, 2011, empowered the Governor to delegate certain functions, in addition to the Secretary of Finance (in that then Mr. Villarreal) had by Law the power to dispose of resources from the State of Coahuila (money) without authorization, nor instruction from the Governor giving the Secretary of Finance and having broad powers and authority over the money in that State.

The above can be verified at:

<http://docs.mexico.justia.com/estatales/coahuila/ley-organica-de-la-administracion-publica-del-estado-de-coahuila-de-zaragoza.pdf>

Mr. Villarreal also falsely stated that he: "was in charge of economic management of Mr. Moreira, personal management, regardless of his public function, housekeeping, travel, cars, everything that Humberto needed ...". This saying demonstrates the ease with which Mr. Villarreal lies, since all the state governments of Mexico have their own budget for the necessary expenses of the governors; for this reason, there was an annual budget for the governor's office, authorized by the State Congress and arranged by the Secretary of Finance Mr. Villarreal. An example of the 2006 budget can be found at:

<http://www.resi.org.mx/icainew f/arbol/docs/Presupuesto-Egresos-06.pdf>

With regards to the statement of the witness Rolando González-Treviño, it does not contain any criminal allegations against Humberto Moreira Valdés. On the contrary, his statement demonstrates the falsity of what Mr. Villarreal has said regarding the alleged acquisition of a radio station by Humberto Moreira Valdés.

The example thus far, are just a few of the false statements Mr. Villarreal's made. The rest of Mr. Villarreal's untrue statements are found in evidence in the DA's defense brief, present by VIRGINIA ARAGÓN SEGURA, in EXHIBIT 1, of this document.

**Criminal behaviors carried out by
HÉCTOR JAVIER VILLAREAL GARCÍA,
(father of HÉCTOR JAVIER VILLAREAL HERNÁNDEZ)**

On November 27, 2018, the investigation folder number 3137/2018 began, in Matamoros Tamaulipas Model colony, when Mr. HÉCTOR JAVIER VILLAREAL GARCÍA was arrested by police officers when he was found with a total of 6 firearms in his 2016 Honda Accord. (5 long firearms and a 9-millimeter pistol)

The long weapons that were recovered are:

1. 7.62 x 39 mm caliber rifle brand roman cugir, model wasr-10 country of manufacture USA semi-automatic erased license plate.

2. Rifle caliber 0.223 rem-5-56X45 mm olympic arms brand, erased model country of manufacture USA semi-automatic erased license plate.
3. Rifle caliber .308 win-7.62X51 mm, model brand, country of manufacture and license plate not in sight, semi-automatic.
4. Rifle caliber 0.223 rem-5-56X45 mm Anderson manufacturing brand, model am-15 country of manufacture USA semi-automatic erased license plate.
5. Rifle caliber 0.223 red-5-56X45 mm Smith & Wesson brand, model myp-15 country of manufacture USA license plate SV32922 semi-automatic.

Currently, a criminal case against Mr. Villarreal García is pending for the crime of collecting weapons for the exclusive use of the Mexican army, army and air force.

The Bonding Order issued against Mr. Villarreal García, is attached to this document and can be identified as Exhibit 4.

**Criminal behaviors carried out
by JUAN FRANCISCO VILLAREAL GARCÍA,
(uncle of HÉCTOR JAVIER VILLAREAL HERNÁNDEZ)**

JUAN FRANCISCO VILLAREAL GARCÍA pleaded guilty to the crime of Against Health, in the form of possession of narcotics in its variant of trade (sale) of Cannabis Sativa, on February 19, 2019, JUAN FRANCISCO VILLAREAL GARCÍA was found in his Chevrolet, Tahoe vehicle, with 3 bags, 2 wrappers and 5 bags containing Cannabis Sativa with a net weight of 5 kilos 710 grams 200 milligrams of the prohibited substance.

On March 19, 2019, JUAN FRANCISCO VILLAREAL GARCÍA pleaded guilty and was sentenced to 4 years in prison and the payment of a fine equivalent to 6,759.20 (six thousand seven hundred fifty-nine pesos 20/100 M.N.); to the suspension of their political and civil rights; to a public warning; to offer a public apology and confiscation of the insured narcotic.

The Judgment handed down to JUAN FRANCISCO VILLAREAL GARCÍA, by the District Judge Specialized in the Accusatory Criminal System, in criminal case 46/2019, is presented as Exhibit 5 of this document.

Exoneration of accusation against Humberto Moreira Valdés in Mexico

Mr. Humberto Moreira Valdés has only had one accusation in Mexico. In 2012, the Office of the Attorney General of the Republic investigated it in the Prior Investigation A.P./PGR/UEIDCSPCAJ/FECCSPF/M-II/267/2012, for the crime of Illicit Enrichment committed to the Public Administration.

The investigation carried out by the Attorney General's Office, where he reviewed the personal accounts of Humberto Moreira Valdés, the Public Account and Finance of the State of Coahuila, led to the conclusion that Humberto Moreira Valdés did not commit any crime according to the investigation and what is stated in the Mexican criminal law.

The resolution of the then Attorney General's Office, constant at 118 pages, where the CONSULTATION OF NON-EXERCISE OF THE CRIMINAL ACTION was issued, is presented as Exhibit 6. of this document.

In addition:

Russ, when I was first asked to assist Mr. Moreira, I googled him and the first article I read was:

CECILIA AGUILAR MORALES
1465 Esterley Tibbetts Highway
KY1- 1201 George Town, Cayman Islands

Account summary

Opening balance on Oct 01, 2014	\$ 26,047,043.70
Debit	\$ 44.00
Deposits	\$ 950,000.00
Closing balance on Oct 28, 2014	\$ 26,996,999.70

I. VANNESSA GUERRERO MARTINEZ
47, boulevard du Jardin Exotique
98000, Monaco

Beginning balance on 04/01-16	\$ 15,693,094.12
Deposits / Additions	\$ 900,000.00
Withdrawals / Subtractions	(-) \$ 795.19
Ending balance on 04/28-16	\$ 16,592,298.93

Account balances of Cecilia Aguilar, top, and Vanessa Guerrero. REFORMA Probe locates \$62mn held by Moreira family

US Treasury Department investigation finds cash in offshore bank accounts

Published on Tuesday, May 16, 2017

A United States Treasury Department investigation has located US \$62.1 million held in offshore bank accounts by the wife and sister-in-law of ex-Coahuila governor Humberto Moreira.

The Reforma newspaper obtained access to a Financial Crimes Enforcement Network (FinCEN) file on the ex-governor that shows multi-million-dollar balances in accounts held in Monaco and the Cayman Islands between 2013 and 2016.

The accounts were in the names of Moreira's wife Vanessa Guerrero and Cecilia Aguilar, wife of the ex-governor's brother Iván.

The file reveals a series of suspicious financial transactions between family members, including dozens of dollar cash deposits to the Broadway Bank in San Antonio, Texas.

An account held by Guerrero at BNP Paribas Private Bank in Monaco reached a peak balance of \$16.6 million in April 2016 after a \$5.8 million transfer from an account at the Broadway Bank held by Ricardo Mendoza.

Mendoza is married to Elisa Moreira, sister of Humberto and current Coahuila governor Rubén Moreira.

The FinCEN file also shows that Guerrero was the holder of an account in the Cayman Islands with the CIBC FirstCaribbean International Bank.

That account reached a maximum balance of \$18.6 million in August 2013 after another deposit from a Broadway Bank account, this time US \$6.4 million from an account held by Cuauhtémoc Esquivel, a Coahuila state education official.

Cecilia Aguilar also held an account with the FirstCaribbean International Bank, which had a balance of \$27 million at the end of 2014 after she too was the beneficiary of a Broadway Bank deposit from Ricardo Mendoza to the tune of \$5.4 million.

Humberto Moreira, who apart from serving as governor from 2005 to 2011, is also an ex-national leader of the Institutional Revolutionary Party (PRI). He had a brush with the law when he [was arrested in Spain in January 2016](#) for suspected money laundering and embezzlement.

He was freed later the same month because of lack of evidence.

U.S. authorities continued to investigate the ex-leader, uncovering the transactions involving family members suspected to be related to money laundering in February 2016.

In September 2016, they had a small win when Vanessa Guerrero's mother, Herminia Martínez, agreed to hand over a \$600,000 residence in Texas to the U.S. government. The house was sold in February.

Source: [Reforma](#) (sp)

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As you can imagine, I read this and wondered why he wasn't already in custody. However, after meeting with Mr. Moreira and his attorneys in Mexico, I realized that none of the information in this article was correct. In fact, Mr. Moreira sued the journalist who first reported this and won. The documents supporting this are attached as my Exhibit 7. Included are the judgment, along with a letter from ENP Paribas explaining that Mr. Moreira's wife never had an account at that bank, and news articles regarding the judgment against the journalist, and the audit done by the Mexican Government of Mr. Moreira's finances. On the flashdrive (which contains all of this information), there is also a video of Mr. Cuauhtémoc Esquivel, appearing extremely upset and explaining that the article is completely false, as he has never had an account at Broadway Bank or any bank with that amount of money in it and he has concerns for his safety, as well as his

family's, after such false claims were made. Mr. Esquivel doesn't have a passport. The SWIFT account numbers are wrong, and the account numbers at Broadway Bank do not exist.

Neither Mr. Moreira nor any members of his family have bank accounts or property in the United States. The only home I believe that was ever owned by anyone, was his mother-in-law's house, which was seized and a portion of the funds was returned.

Also, the money going into the account for Mr. Villareal, under Jose Martino Hernandez, appears to have dried up, once his father was arrested in Mexico in November 2018. Mexican authorities are looking into all of the members of the Villareal family to try to uncover additional funds stolen by him from the State of Coahuila.

If there is anything else you need, please do not hesitate to contact me. All in all, the purpose of this proffer was to inform you of the illegal activities Mr. Villareal has continued to conduct while in the United States, and to show you how much misinformation is reported regarding Mr. Moreira. His attorneys in Mexico, Spain, and myself would like him to be able to continue with his life, without worrying that the false statements and crimes committed by others will be held against him. I hope this is helpful and you can let me know where the Government stands with regards to prosecuting Mr. Moreira or not.

I really appreciate you allowing me to try to get you all the information I could find and look forward to discussing this further once you have had time to review it all.

Sincerely,

Robbie L. Ward
Lawyer